

Massachusetts Department of Environmental Protection  
Bureau of Waste Prevention – Toxics Use Reduction Program  
**Instructions for Certification and Recertification**  
**Limited Practice Toxic Use Reduction Planner**  
**BWP-TU02 & BWP-TU04**

---

*Limited Practice (LP)*  
**Toxics Use Reduction Planner**  
**Certification Instructions**

The Massachusetts Department of Environmental Protection (MassDEP) certifies Toxics Use Reduction (TUR) Planners. Once certified by MassDEP, TUR Planners may certify toxics use reduction plans for companies that are required to report under the Massachusetts Toxics Use Reduction Act (TURA) and 310 CMR 50.00. TUR Planners may apply for General Practice (GP) certification or a Limited Practice (LP) certification. These instructions are for a LP certification.

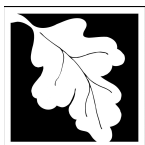
LP planners may certify plans only for facilities owned and operated by their employers. To apply for certification or re-certification as a LP TUR Planner, the applicant must do the following:

**Checklist for Limited Practice Toxics Use Reduction Planner**

- ☐ Complete the *Certification or Recertification Application Form for a Limited Practice Toxics Use Reduction Planner (BWP - TU 02 & BWP - TU 04)*. This form can be found on the MassDEP's website: [www.mass.gov/dep/toxics/approvals/turforms.htm#cert](http://www.mass.gov/dep/toxics/approvals/turforms.htm#cert)
- ☐ Receive a *Transmittal Number* and fill out the *Transmittal Form* (found on MassDEP's website: [mass.gov/dep/service/online/trasmfrm.shtml](http://mass.gov/dep/service/online/trasmfrm.shtml)). The transmittal number allows the applicant to apply for a permit. The number should be placed in the upper right hand corner of the application.
- ☐ Make and keep a copy of the Application and the Transmittal Form for your records.
- ☐ Mail the original Application, the appropriate fee, and the original Transmittal Form to MassDEP. **Please note:** the application and fee are sent to two different addresses.

These instructions provide additional guidance on the following topics:

- I. Application Instructions for Certification or Re-certification for a LP TUR Planner
  - II. Transmittal Number and Form For Permit Application
  - III. Certification Fees
  - IV. Mailing the Application
  - V. Certification and Re-certification Review
  - VI. Questions
- I. For more information on Toxics Use Reduction Planners, visit:  
[www.mass.gov/dep/toxics/tura/planners.htm](http://www.mass.gov/dep/toxics/tura/planners.htm)



Massachusetts Department of Environmental Protection  
Bureau of Waste Prevention – Toxics Use Reduction Program  
**Instructions for Certification and Recertification**  
**Limited Practice Toxic Use Reduction Planner**  
**BWP-TU02 & BWP-TU04**

---

**APPLICATION INSTRUCTIONS FOR CERTIFICATION OR RE-CERTIFICATION FOR A  
LP TUR PLANNER.**

Applicants seeking certification or re-certification as a LP TUR Planner should submit to MassDEP a completed *Application for Certification or Re-certification of a Limited Practice Toxics Use Reduction Planner* found at [www.mass.gov/dep/toxics/approvals/turforms.htm#cert](http://www.mass.gov/dep/toxics/approvals/turforms.htm#cert).

- For Initial Certification as a LP TUR Planner – complete sections A, B, C, D, and H.
- For Re-certification as a LP TUR Planner – complete sections A, B, C, E, and H.
- For Certification to sign Environmental Management Systems or Resource Conservation Plans – complete sections F and/or G.

**Section A: Certification Information**

Applicants must indicate the type of certification being requested:

1. Indicate whether applying for certification or re-certification as a LP TUR Planner.
2. Indicate whether applying for certification to sign an Environmental Management System and/or Resource Conservation Plan.

**Section B: Applicant Information**

Applicants must provide general information about themselves and the company they plan to certify plans for.

**Section C: Certification Statement**

Applicants must sign and date the statement testifying to an honest and good faith effort to supply truthful information.

**Section D: Information for Limited Practice Certification**

**1. *Employment Information***

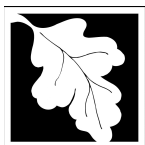
Applicants must provide specific information on their employment experience and/or educational experience (if substituting for partial employment experience).

**a. *Employment Experience:***

The applicant must provide current and past employment history demonstrating the applicant has seven (7) years of work experience in the fields listed in the application. MassDEP may, at its discretion, allow work experience in areas other than those listed to count toward the required work experience IF the applicant demonstrates that the experience is related to the skills and knowledge a TUR Planner must possess. Use the following as guidance on how to calculate years of employment experience:

*For individuals whose job responsibilities include the routine use of the skills needed to perform or evaluate the requisite analyses outlined, the seven (7) years experience is gained if they worked at such a job full-time (at least 37.5 hours /week) for 7 years. Note that it is not necessary for the applicant's work to be limited to these activities. All that is required is that the activities be routinely conducted. Part-time work of this nature should be pro-rated. For example, someone who worked 17.5 hours/week would have to work at the job for 14 years.*

*For individuals whose primary job responsibilities do NOT include the routine use of the skills needed to develop or evaluate a TUR plan, the seven (7) years of experience is gained if they*



Massachusetts Department of Environmental Protection  
Bureau of Waste Prevention – Toxics Use Reduction Program  
**Instructions for Certification and Recertification**  
**Limited Practice Toxic Use Reduction Planner**  
**BWP-TU02 & BWP-TU04**

have worked for a total of 7 years on projects in which they used skills needed to perform or evaluate the requisite analyses.

*Part-time work* is also pro-rated if the person always worked part-time. The elapsed time should be pro-rated, so the applicant would need a total of 48 months.

b. **Educational Substitution:**

The applicant may substitute up to five (5) years of the required seven (7) years of employment experience. **If you are not seeking educational substitution, this section is optional.**

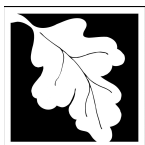
- i. Indicate if you are seeking educational substitution for work experience.
- ii. Indicate the number of years you are seeking to substitute.
- iii. List the educational information requested, including whether you have obtained a certificate or degree. See text box below for a list of acceptable educational substitutions. If the degree or certificate is not one of the fields described below, the applicant may explain why the education is relevant. The regulations allow MassDEP to accept, at its discretion, other education as a substitute for the required work experience, provided that the applicant can show that the education is relevant.

<b>List of Acceptable Educational Substitutions (See 310 CMR 50.52 (3))</b>	<b>Number of years needed</b>
Vocational or Technical Certificate:	1 year
Associate Degree with a concentration or major <u>directly</u> related to the work experience set forth in the regulations (or in biology, chemistry or physics):	2 years
Bachelor's Degree with a concentration or major <u>directly</u> related to the work experience set forth in the regulations (or biology, chemistry or physics)	4 years
Bachelor's Degree with a concentration or major <u>indirectly</u> related to the work experience set forth in the regulations (or in biology, chemistry or physics):	3 years
Master or Doctorate Degree with a concentration or major <u>directly</u> related to the work experience set forth in the regulations (or in biology, chemistry or physics):	5 years
Master or Doctorate Degree with a concentration or major <u>indirectly</u> related to the work experience set forth in the regulations	4 years

**2. Demonstrated Experience in Toxics Use Reduction:**

TURA and its implementing regulations require that two (2) years out of the seven (7) years listed above meet the criteria for full-time experience specific to toxics use reduction activities. Please note that this can be part of the 7 years of experience required above, however, detailed information is required in process characterization, options identification, technical evaluation, and economic evaluation. Alternatively, an applicant may satisfy this requirement by taking the TUR Planner course and passing the TUR Planner exam (see section D-3). Please note that if the applicant has satisfactorily completed the Toxic Use Reduction Institute's (TURI) TUR Planner Course, they may substitute 6 months of the demonstrated TUR experience with completing this course.

- a. Indicate whether you are claiming at least 2 years of experience in TUR in lieu of taking the MassDEP TUR exam. In that case, you do not need to complete section D.3 of the application.
- b. Describe how your work experience has provided you with the 2 years of specific "toxic use reduction activities". Please provide the name of the employer at which the experience was



Massachusetts Department of Environmental Protection  
Bureau of Waste Prevention – Toxics Use Reduction Program  
**Instructions for Certification and Recertification**  
**Limited Practice Toxic Use Reduction Planner**  
**BWP-TU02 & BWP-TU04**

---

gained, a brief description of the experience itself (or the project name, if applicable), and the dates during which you gained the experience or worked on the project(s).

- c. Indicate whether you have attended and completed the TURI TUR Planner course. If so, substitute 6 months of demonstrated TUR experience with satisfactorily completing this course.
- d. Describe how the 2 years of experience listed above applies specifically to TUR. TUR activities are activities that require skills needed to develop or evaluate toxics use reduction plans and are listed below. The applicants must demonstrate that they have experience that has given them the skills needed to perform or evaluate each of these analyses. The experience could be working on TUR projects or on other tasks that are sufficiently similar in that they involve the required skills. If the experience is not in TUR, the applicant must explain how their experience is relevant to TUR planning (unless the relevance is clearly apparent).

<b>Toxic Use Reduction Activities (from 310 CMR 50.51 (2))</b>	
<b><u>Process Assessment</u></b>	includes determining: (1) why a toxic chemical or production process is used, (2) the points where the chemical enters or leaves the production process, and (3) the amounts of toxic chemicals used and the amount produced as byproducts and emissions. Process assessment also involves determining whether or not a process flow diagram corresponds to actual facility operations.
<b><u>Options Identification</u></b>	includes (1) generating a list of options or alternatives to current process operations or chemical use, (2) identifying when additional sources of information need to be consulted and locating those sources, and (3) determining if a given option is or is not toxics use reduction.
<b><u>Technical Evaluation:</u></b>	includes analyzing the technical feasibility of a potential change in process operations or chemical use. This category also includes identifying and evaluating the potential impacts of such changes on (1) worker health and safety, (2) the possible need to comply with other environmental laws, (3) the amount of chemicals used and/or produced as byproducts or emissions as a result of the change, and (4) the facility's operation and function.
<b><u>Economic Evaluation:</u></b>	includes analyzing the economic feasibility of a potential change in process operations or chemical usage including an analysis of the costs and savings associated with the change.

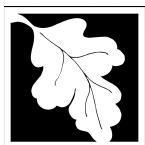
**Other Related Activities:** Describe any experience which does not fit into one or more of the four categories mentioned above but that you believe is TUR<sup>1</sup>.

- e. Indicate if you will certify plans for any facility owned or operated by your employer<sup>2</sup> other than the one at which you are currently employed. If so, provide the facility name, address, MassDEP facility ID number, and a description of “at least one year of experience in toxic use reduction activities” that is related to the operation of the facility.

---

<sup>1</sup> Note that the Regulations focus on the skills needed to perform or evaluate such analyses. The intent is to allow flexibility for those seeking to become TUR Planners. An applicant may not at this point have worked on a toxics use reduction project, but may have other relevant experience that demonstrates the required skills. Such an applicant, for example, may have evaluated potential changes in facility operations as part of a total quality improvement team. This applicant would need to demonstrate in his/her application how that experience provided the skills needed for the “technical evaluation” category.

<sup>2</sup> The term “employer” is defined at 310 C.M.R. 50.55(6) as meaning “an individual or organization for whom the planner works or receives wages on a regular basis.”



Massachusetts Department of Environmental Protection  
Bureau of Waste Prevention – Toxics Use Reduction Program  
**Instructions for Certification and Recertification**  
**Limited Practice Toxic Use Reduction Planner**  
**BWP-TU02 & BWP-TU04**

---

### 3. Toxics Use Reduction Planner Exam Certification

Successfully completing the TUR Planner Course developed by the Toxics Use Reduction Institute and passing the TUR Planner exam given by MassDEP may substitute for the required two years of toxics use reduction work experience. In order to qualify for certification, you need to apply to MassDEP within two years of passing the exam. If you have completed the TURI TUR Planner course AND passed the MassDEP certification exam, you do not need to complete section D.2 of the application.

- Give date and location of the toxics use reduction planner certification course you took.
- Attach a copy of your TUR Planner course certificate to the application.
- Give date and location where you took the MassDEP TUR Planner exam.
- Attach a copy of the letter from MassDEP verifying that you passed the TUR Planner exam.

### Section E: Information for Limited Practice Re-Certification

TUR Planners must become re-certified every two (2) years by completing a specific amount of continuing education credits in “toxics use reduction activities” over a two-year period. Generally, one (1) hour spent in a continuing education activity equals one (1) continuing education credit. Activities approved by MassDEP for the purposes of re-certification include seminars or any other educational or professional programs relating to TUR sponsored by MassDEP or the Office of Technical Assistance and Technology, the Toxics Use Reduction Institute, the U.S. Environmental Protection Agency, or other organizations.

Indicate if applying for first time re-certification or subsequent re-certification credits using the following table:

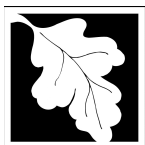
Certification Type	Number of Credits Needed
First Recertification	24 credits
Second, Third, Etc. Recertification	20 credits

Then provide additional information on the continuing education activities. This includes activity; dates attended, hours in attendance, brief description of the activity and number of re-certification credits you are seeking.

#### Re-Certification Credit Guidance:

In order to be approved for re-certification, credits must fall into, and abide by, the following categories:

- Education and training focused on the toxics use reduction planning process as defined by 310 CMR 50.51(2) (toxics use reduction training shall not include the Toxics Use Reduction Planner Course offered by the Toxics Use Reduction Institute when taken by a TUR Planner as a requirement for certification or the development of a Toxic Use Reduction Plan); or
- Other environmental laws or regulations, or laws or regulations pertaining to worker health or safety (e.g. wastewater treatment, hazardous waste management, air emissions, surface water runoff, industrial hygiene, hazard communication), except that such education may not count for more than four (4) credits during any 2-year period; or
- Professional activities related to TUR may, at MassDEP’s discretion, count toward up to eight (8) credits and include, but are not limited to:



Massachusetts Department of Environmental Protection  
Bureau of Waste Prevention – Toxics Use Reduction Program  
**Instructions for Certification and Recertification**  
**Limited Practice Toxic Use Reduction Planner**  
**BWP-TU02 & BWP-TU04**

---

- Presenting or publishing papers;
- Teaching;
- Participation in professional or trade associations;
- Mentoring, being mentored, special projects and “pro-bono” work with communities (the applicant is required to submit a proposal to MassDEP for review and approval); or
- Participation in advisory committees for governmental agencies

**Other Credit Information**

- *Double Credits:* Programs or topics that are “especially relevant or important to the responsibilities of TUR Planners,” as approved by MassDEP may be counted up to a maximum of 2 credits per course hour (i.e., “double credit”).
- *Topics not considered TUR training:* Topics in pollution treatment or control DO NOT count toward the coursework required under “toxics use reduction training”, but may be eligible for credit under “other environmental laws or regulations, or laws or regulations pertaining to worker health or safety”. (4 credit maximum)

The TURA Program agencies are the primary sponsors of continuing education activities:

- Massachusetts Toxics Use Reduction Institute at UMass, Lowell ([www.turi.org/](http://www.turi.org/))
- Massachusetts Office of Technical Assistance and Technology ([www.mass.gov/envir/ota](http://www.mass.gov/envir/ota))
- Massachusetts Department of Environmental Protection ([www.mass.gov/dep/toxics/toxicsus.htm](http://www.mass.gov/dep/toxics/toxicsus.htm))

**Section F. Environmental Management System Certification**

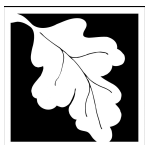
Applicants seeking to certify EMSs must demonstrate that they have experience or training in EMSs by (for more information on EMS certification requirements see the Environmental Management System Guidance under the Toxics Use Reduction Act at [www.mass.gov/dep/toxics/laws/policies.htm](http://www.mass.gov/dep/toxics/laws/policies.htm)):

1. Indicating that they are accredited or certified under a recognized Environmental Management System Standard (e.g., ISO 14001, Responsible Care®) OR
2. Demonstrating 16 hours of continuing education credits in EMS and providing information on the courses, seminars, or other educational or professional programs or activities necessary to support a request for continuing education credits. This is a one-time credit requirement; no additional EMS credits are required for future re-certifications. These credits do not change the total number of credits needed in Section E.
3. Demonstrating two (2) years of EMS employment experience, including auditing environmental management systems, by identifying the specific employment experience and describing duties, responsibilities, skills and or/knowledge acquired in completing the EMS.

**Section G. Resource Conservation Plan Certification**

Applicants seeking to certify Resource Conservation Plans must demonstrate that they have completed continuing education credits by identifying the courses, seminars, or other educational or professional programs or activities necessary to support request for Resource Conservation certification.

- Twelve (12) continuing education credits are required for the first certification. At least six (6) of the 12 credits must be in applying TUR planning methods to Resource Conservation Planning. The remaining credits must be related to any of the following assets: energy, water, materials found in solid waste, and/or toxics in articles and products.



Massachusetts Department of Environmental Protection  
Bureau of Waste Prevention – Toxics Use Reduction Program  
**Instructions for Certification and Recertification**  
**Limited Practice Toxic Use Reduction Planner**  
**BWP-TU02 & BWP-TU04**

---

- These credits do not change the total number of credits needed in Section E.
- No Resource Conservation planning credits are needed to certify Resource Conservation plans that focus on toxics substances used below threshold amounts or chemical substances exempt from TURA reporting.
- Nine (9) continuing education credits are required every 4 years thereafter for subsequent re-certification, including three (3) credits in each of the following areas: energy, water and materials found in solid waste.

For more information on Resource Conservation Planning, see MassDEP's Resource Conservation Planning Guidance at [www.mass.gov/dep/toxics/laws/policies.htm](http://www.mass.gov/dep/toxics/laws/policies.htm).

#### **Section H. Supporting Documentation**

Applicants must provide documentation verifying the applicant's attendance at the continuing education activities listed in sections E, F and G. Such documentation should describe the course or events and the hours in attendance, (e.g., course syllabus or event itinerary and a copy of the sign-up sheet or a certificate of completion).

#### **Section I. Continuing Education Pre-Approval**

If you would like prior approval of continuing education activities, complete and submit the "Continuing Education Credit Application" located at [www.mass.gov/dep/toxics/approvals/turforms.htm](http://www.mass.gov/dep/toxics/approvals/turforms.htm).

If MassDEP does not approve a continuing education activity in TUR Planner Re-certification Application, MassDEP may, at its discretion, extend a TUR Planner's Certification Period. The affected TUR Planner may remain certified while attending another activity to be used for re-certification purposes, in place of the disapproved activity. See Section V below for additional information on certification and re-certification application review.

## **II. TRANSMITTAL NUMBER AND FORM FOR PERMIT APPLICATION**

Certification and re-certification as a TUR Planner is done through the MassDEP Permitting process, so a Transmittal Form for Permit Application and Payment with a Transmittal Number must accompany the certification application and fee. The transmittal number and "*Transmittal Form*" are available from MassDEP's web site at [www.mass.gov/dep/service/online/trasmfrm.shtml](http://www.mass.gov/dep/service/online/trasmfrm.shtml) or you can call MassDEP at 617-292-5541.

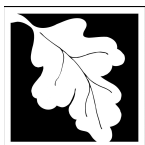
The transmittal number is generated by a counter on the MassDEP web site and is a unique identifier for transmitting and processing permit applications. A new transmittal number is needed each time you re-certify.

Once the form is completed, make two (2) copies; the original must accompany the application, a copy must accompany the fee payment and a copy should be kept for your records. **Please note:** the application and fee must be sent to two different addresses.

## **III. APPLICATION FEES**

The appropriate application fee noted below must be submitted MassDEP for TUR Planner Re-certification (there are no additional fees associated with certifying an EMS and/or Resource Conservation Plan).

Initial Certification	\$100
Re-certification	\$75



Massachusetts Department of Environmental Protection  
Bureau of Waste Prevention – Toxics Use Reduction Program  
**Instructions for Certification and Recertification**  
**Limited Practice Toxic Use Reduction Planner**  
**BWP-TU02 & BWP-TU04**

---

Please mail the application fee (check) along with a copy of the "Transmittal Form" to:

Department of Environmental Protection  
P.O. Box 4062  
Boston, Massachusetts 02211

#### **IV. MAILING THE APPLICATION**

Please send the completed TUR Planner Certification or Re-certification Application along with a copy of the Transmittal Form to:

Department of Environmental Protection  
TUR Planner Certification Program  
1 Winter Street  
Boston, MA 02108

Re-certification Applications must be received by MassDEP prior to the expiration of the applicant's Initial Certification or current Re-certification period. The applicant will remain certified as a GP TUR Planner until MassDEP reaches a final decision on the TUR Planner's application and notifies the applicant. Failure to follow this procedure will result in an expiration of the TUR Planner's certification and may subject the TUR Planner to disciplinary proceedings.

#### **V. CERTIFICATION AND RE-CERTIFICATION APPLICATION REVIEW**

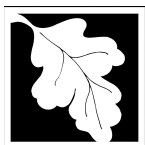
Normally, the application review process does not take more than three (3) weeks, assuming the application is filled out correctly and contains all the necessary supporting documentation and the appropriate fee is paid.

Following the review, MassDEP will issue a written decision granting or denying certification. Certification shall be granted for a two (2) year period beginning as of the date of the written decision granting certification. A decision denying certification will state the grounds for such denial and, if applicable, specify conditions that the applicant must fulfill in order to be certified. A TUR Planner whose certification application is denied may request an adjudicatory hearing in accordance with M.G.L. c. 30A and 310 CMR 50.60. In addition, MassDEP reserves the right to deny certification to any TUR Planner found by MassDEP to be negligent, fraudulent or misrepresentative, or unethical in connection with the duties and responsibilities as set forth in 310 CMR 50.00.

##### ***Re-certification Determination Criteria:***

1. Courses "approved by the Department" for the purposes of re-certification include courses, seminars, or any other educational or professional programs relating to TUR sponsored by MassDEP, the Office of Technical Assistance and Technology, the Toxics Use Reduction Institute, the U.S. Environmental Protection Agency, or other organizations. Any applicant who has questions regarding the applicability of an activity for re-certification purposes may receive a written credit determination by filling out and submitting the *Continuing Education Credit Application* (see Section I above for additional information).
2. Generally, one (1) hour spent in a continuing education activity equals one (1) re-certification credit. MassDEP may, at its discretion, specify that one hour of time spent in a specific continuing education activity shall equal more than one credit. A specific continuing education activity can count up to two (2) credits, if MassDEP determines that a particular course, seminar, or other program, or a particular subject, is especially relevant or important to the responsibilities of TUR Planners.





**Massachusetts Department of Environmental Protection  
Bureau of Waste Prevention – Toxics Use Reduction Program  
Instructions for Certification and Recertification  
Limited Practice Toxic Use Reduction Planner  
BWP-TU02 & BWP-TU04**

---

3. If MassDEP does not approve a continuing education activity upon submission of a TUR Planner Re-certification Application, MassDEP may, at its discretion, extend a TUR Planner's Certification Period. The affected TUR Planner may remain certified while attending another activity to be used for re-certification purposes, in place of the disapproved activity.
4. Topics on pollution treatment or control DO NOT count toward the coursework required under "toxics use reduction activities", but may be eligible for credit under "other environmental laws or regulations, or laws or regulations pertaining to worker health or safety". (4 credit maximum)
5. MassDEP reserves the right to deny re-certification to any TUR Planner found by MassDEP to be negligent, fraudulent or misrepresentative, or unethical in connection with the duties and responsibilities set forth in 310 CMR 50.00.

#### **VI. QUESTIONS**

Please contact David Minucci in the TUR Planner Certification Program at 617-292-5541 with any questions you may have concerning re-certification.